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*Attorneys for Defendants*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

AYNUR KABOTA, an individual,  
  
Plaintiff,

vs.

EDUVISION, INC., dba ARIZONA  
COLLEGE, a foreign corporation domiciled in  
Missouri; SENTINEL PEAK CAPITAL, LLC,  
dba ARIZONA COLLEGE, a Delaware  
Limited Liability Company; DIANE  
THOMASON, an individual; DANIEL J.  
NAVARRO, an individual; PATRICIA T.  
ALPERT, an individual; MARIE  
HALLINAN, an individual,  
  
Defendants.

CASE NO. 2:19-cv-01497-JAD-VCF

**STIPULATION AND ORDER FOR TO  
EXTEND DISCOVERY AND  
SCHEDULING ORDER [LR IA 6-1(a) and  
LR 26-4]**

**(Third Request)**

Pursuant to LR IA 6-1(a) and LR 26-4, the parties, by and through their respective counsel of record, hereby state as follows:

1. On September 11, 2020, this Court entered an Order granting the initial Stipulated Discovery Plan and Scheduling Order (ECF No. 41.) and agreed to extend the initial deadlines on February 17, 2021. (ECF No. 43.)
2. On November 30, 2021, this Court entered an Order granting Plaintiff's Motion to Extend Time. (ECF No. 53.)
3. This is the third request by the parties to amend the Court's Discovery Plan and

1           Scheduling Order.

- 2           4.     The parties stipulate and agree to extend the discovery, dispositive motion and joint  
3           pretrial order deadlines for at least thirty (30) days in order to conclude pending  
4           discovery. Plaintiff and Defendants seek to supplement the discovery with written  
5           requests and pursue further depositions.

6     **I.     STATEMENT OF DISCOVERY THAT HAS BEEN COMPLETED:**

- 7           1.     To date, the parties have exchanged initial disclosures, Plaintiff and Defendants have  
8           propounded interrogatories, requests for production and requests for admissions.  
9           2.     Plaintiff and Defendants have noticed the depositions of all parties and will be  
10          noticing depositions for additional witnesses.  
11          3.     Plaintiff and Defendants have served their respective expert witness and rebuttal  
12          disclosures.

13     **II.    DISCOVERY YET TO BE COMPLETED:**

- 14          1.     Plaintiff has noticed the depositions of Diane Thomason, Daniel Navarro, Patricia  
15          Alpert, and Marie Hallinan.  
16          2.     Defendants has noticed the deposition of Aynur Kabota and is coordinating date for  
17          the deposition of Rami Kabota.  
18          3.     Plaintiff and Defendants may notice further depositions to be completed within the  
19          discovery deadline, if extended.

20     **III.   WHY THE DEADLINES HAVE NOT BEEN SATISFIED:**

- 21          1.     As set forth above the COVID-19 pandemic has delayed discovery. Plaintiff retained  
22          new counsel and Defendants' counsel of record left his law firm, necessitating a  
23          transfer of the matter to other attorneys at the firm. It has taken some time for counsel  
24          for Plaintiff and Defendants to get acquainted with the case. The parties are working  
25          together to coordinate outstanding discovery as detailed in this stipulation.

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Thus for good cause and not for the purpose of delay, the parties request that the discovery period be extended as follows:

Activity	Current Date	Requested Date
Discovery Cut-Off Date	02/28/2022	03/31/2022
Dispositive Motions	03/30/2022	05/02/2022
Pretrial Order	05/01/2022	06/01/2022

This request is being made within 21 days of the current discovery cut-off and other deadlines. Further any further requests for extensions will be made at least 21 days before the deadline that extension of is sought.

If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

DATED this 10th day of February, 2022.

LAW OFFICES OF MICHAEL P.  
BALABAN

LEWIS BRISBOIS BISGAARD &  
SMITH, LLP

/s/ Michael P. Balaban

/s/ Inku Nam

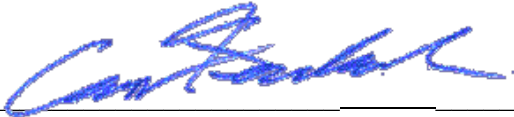
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dba Arizona College, et al.

IT IS SO ORDERED

  
Honorable Magistrate Judge Cam Ferenbach

DATED: 2-10-22